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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:
**PROFESSIONAL FINANCIAL INVESTORS,
INC.**, a California corporation, et al.,

Debtors.

Case No. 20-30604 (HLB)

(Jointly Administered)

Chapter 11

**DECLARATION OF MICHELLE
HERMAN IN SUPPORT OF
TRUSTEE'S SEVENTH OMNIBUS
OBJECTION (SATISFIED
SCHEDULED REAL ESTATE
PROPERTY TAX CLAIMS)**

Date: March 17, 2022
Time: 10:00 a.m.
Judge: Hon. Hannah L. Blumenstiel
Place: Telephonic/Video
Appearances Only

I, Michelle Herman, declare:

1. I am a Senior Managing Director of FTI Consulting, Inc. ("FTI"), financial advisor to the PFI Trust and make this declaration of my own personal knowledge. If called as a witness, I could and would testify competently thereto.

2. I make this declaration in support of the *PFI Trustee's Seventh Omnibus Objection (Satisfied Schedule Real Estate Property Tax Claims)* (the "Omnibus Objection"). Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Omnibus Objection.

1 3. On May 13, 2021, the Debtors filed their amended schedules, which listed certain
2 secured real estate taxes owed to governmental authorities. The Debtors' scheduled real estate tax
3 obligations were paid during the pendency of the cases.

4 4. I have determined that each Claim on **Exhibit 1** should be disallowed because each is
5 unenforceable against the Debtors under applicable law as the Claims have been satisfied and should
6 therefore be disallowed and expunged from the claims registry in order to ensure that a double
7 recovery is not received

8 I declare under penalty of perjury under the laws of the United States of America that the
9 foregoing is true and correct, and that this declaration was executed this 10 day of February 2022 at
10 Los Angeles, California.



Michelle Herman